

REMARKS/ARGUMENTS

The office action of June 28, 2006 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1, 4, 9, 12, 22, 27 and 29-49 remain pending in this application. Claims 2-3, 5-8, 10-11, 13-21, 23-26 and 28 were previously canceled without prejudice or disclaimer.

Applicants have amended claims 35 and 37 to remove extraneous commas and add the word “and” to improve clarity; no change in claim scope has occurred.

Claims 1, 9, 22, 27, 33-35, 37, 39 and 41-49 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent no. 5,463,725 to Henckel et al. (“Henckel”) in view of Hutchinson et al., Microsoft PowerPoint, Microsoft Office 97 Professional, the McGraw-Hill Co. (“Hutchinson”). Applicants respectfully traverse this rejection.

The action alleges that Henckel shows all the features of independent claims 1, 9 and 33, but for an interactive region that includes only a portion of the immersive reading page. To overcome this deficiency, the action relies on Hutchinson.

Independent claims 1 and 9 call for, among other features, associating navigational functionality with a page number of the immersive reading page, the page number having a corresponding interactive region that includes only a portion of the immersive reading page. Applicants note that, apparently contrary to the action’s contention, Henckel also does not teach or suggest associating navigational functionality with the *page number*. Turning the page or otherwise navigating in Henckel is not associated with the page number. Indeed, turning the page involves the user swiping his hand across the display of the page; thus the navigational functionality would at best be associated with the entire page rather than the page number. Hutchinson fails to remedy this deficiency of Henckel.

Hutchinson allows a user to navigate between slides by pointing and clicking on a button displayed in the bottom left hand corner during a slide show. Notably however, Hutchinson neither teaches nor suggests associating navigating functionality with a page number. At best, Hutchinson associates navigating functionality with buttons, which are not part of the slide, on the bottom left hand corner of a slide. For at least this reason, the combination of Henckel and Hutchinson, even if proper, does not result in the claim 1 and 9 inventions includes associating

navigational functionality with a page number of the immersive reading page, the page number having a corresponding interactive region that includes only a portion of the immersive reading page.

Even assuming the combination of Henckel and Hutchinson would somehow have resulted in the invention of claims 1 and 9, one skilled in the art would not have been motivated to combine these references. The Background of Invention section at col. 1, lines 22-46 of Henckel is instructive:

For example, improvements in data storage and display technologies have combined to make the electronic book possible. Various proposals exist for making a device having the approximate size and shape of a hardback book. The approach is typically to display pages on a screen to look like an actual printed book. Such display technologies can be used with traditional computer display screens.

To turn pages in a book, magazine, or other document which is displayed in such a manner, the user typically touches a paging button dedicated to this purpose. In a few proposed devices, touch sensitive screens have been used for displaying the image of the book pages, and forward and backward paging buttons, or other locations, are displayed on such screen to enable the user to turn the pages. Alternatively, especially for use on a typical computer workstation, a mouse or other pointer device can be used to select the buttons which cause pages to be turned. However, use of such buttons is not particularly intuitive for the unknowledgeable user.

It would therefore be desirable to provide an interface for displaying information which is usable in an intuitive manner by an unknowledgeable user. It is further desirable for such an interface to be as similar as possible to the use of actual paper reading materials such as books and magazines.

(Emphasis supplied). Notably, Henckel acknowledges that forward and backward paging buttons have been used to allow a user to turn the page of a book. However, Henckel rejects using such buttons and instead focuses on providing an interface which is usable in an intuitive manner and is as similar as possible to the use of actual paper reading materials. Not surprisingly the Summary of the Invention section at col. 1, lines 56-57 of Henckel describes the page turning technique of the invention, movement of the user's hand or pointing device across the screen, as "very similar to the turning of a page with an actual book or magazine."

Moreover, the detailed description, at col. 2, lines 44-50, of Henckel describes that page turning using buttons is non-intuitive counter to the intent of the invention (of Henckel), whereas the technique for turning pages shown in Figure 2 is very intuitive. *See also* Henckel, col. 6, lines 56-67.

The action at page 4 contends that one skilled in the art would have been motivated to combine Henckel and Hutchinson “to provide a particular area to the user.” Applicants submit that Henckel teaches away from such a combination by distinguishing from paging buttons and emphasizing the desirability to provide an interface to be as similar as possible to the use of actual paper reading materials. In addition, combining Henckel and Hutchinson would have destroyed the intended purpose of Henckel of providing an intuitive interface. For at least these reasons, the combination of Henckel and Hutchinson would not have been proper. As such, claims 1 and 9 are further distinguishable over the combination of Henckel and Hutchinson.

Independent claim 33 calls for, among other features, associating navigational functionality with an element of the immersive reading page, the element having a corresponding interactive region that includes only a portion of the immersive reading page, and is patentably distinct from Henckel and Hutchinson for substantially the same reasons as claims 1 and 9 set forth above.

Claims 22 and 35, which depend from claim 1, claims 27, 37 and 41-46, which ultimately depend from claim 9, and claims 34, 39 and 47-49, which depend from claim 33, are patentably distinct over the combination of Henckel and Hutchinson for the same reasons as their ultimate base claim, and further in view of the additional advantageous features recited therein.

For example, claims 35 and 37 each call for the associating functionality with an element of the immersive reading page, the element being different than the page number and having a corresponding interactive region, and the functionality being different from the navigation functionality associated with the page number. The action points to col. 1, lines 51-55 and col. 2, lines 51-56 of Henckel to show this feature. However, Henckel does not teach or suggest associating functionality with any element of the immersive reading page including the page number or title as ostensibly discussed with respect to claims 1 and 9.

In addition, claims 42, 46 and 49 call for the interactive region corresponding to the element (claim 49) or page number (claims 42 and 46) includes an area to the right of the element or page number and an area to the left of the element or page number, and wherein the step of displaying includes displaying a previous page of the electronic document in response to the user selecting the area to the left of the element or page number and displaying a subsequent page of the electronic document in response to the user selecting the area to the right of the element or page number. To show these features, the action relies on Hutchinson. However, Hutchinson nowhere teaches or suggests an interactive region corresponding to the element (claim 49) or page number (claims 42 and 46) including an area to the right of the element or page number and an area to the left of the element or page number. Indeed, no page number (or element) is shown which has an interactive region to its left or right.

Claims 29, 31, 36, 38 and 40 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Henckel in view of Microsoft Word. Applicants are unsure as to what art is being applied to reject these claims as Microsoft Word is not actually supplied as prior art and because the rejected claims depend on other claims which were rejected over Henckel and Hutchinson. Claims 29 and 36, ultimately depend from claim 1, claims 31 and 38, ultimately depend from claim 9 and claim 40 ultimately depends from claim 33. Applicants assume that the combination the action intended to apply was Henckel and Hutchinson. As such, these claims 29, 31, 36, 38 and 40 are patentably distinct from the combination of Henckel and Hutchinson for the same reasons as their ultimate base claim and intervening claims as well as the additional novel features recited therein.

Claims 4, 12, 30 and 32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Henckel in view of Hutchinson and further in view of U.S. patent no. 6,407,757 to Ho. Applicants respectfully traverse this rejection.

Ho fails to remedy the defects with the combination of Henckel and Hutchinson as well as the lack of motivation to combine. Thus, claims 4 and 30, which depend from claim 1, and claims 12 and 32, which depend from claim 9, are patentably distinct for the same reasons as their ultimate base claim, and further in view of the additional advantageous features recited therein.

CONCLUSION

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

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